

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
(Philadelphia)**

MICHELE M. BURNS

Plaintiff,

v.

FORD MOTOR CREDIT COMPANY,
LLC, TRANS UNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC and
MICHAEL J. BURNS

Defendants.

Civil Action No. 2:19-cv-01647-RBS

NOTICE OF MOTION IN LIMINE

TO: Mark A. DiAntonio, Esquire
Attorney ID No. 81115
McCann Law, LLC
1800 JFK Blvd., Suite 1812
Philadelphia, PA 19103

PLEASE TAKE NOTICE that Defendant Ford Motor Credit Company LLC will move this Court, before the Honorable R. Barclay Surrick, Senior United States District Judge, at the United States District Court for the Eastern District of Pennsylvania, James A. Bryne U.S. Courthouse 601 Market Street, Room 8614, Philadelphia, Pennsylvania 19106, on a date and time to be determined by the Court, for an Order, pursuant to Federal Rules of Evidence 702, 401 and 403, precluding plaintiff from offering any testimony, references to testimony or argument based upon the testimony or opinions of Dr. David Nadler (“Dr. Nadler”) and precluding the entry of Dr. Nadler’s expert report.

In support of this motion, Defendants rely upon the accompanying memorandum of law and all of the pleadings, records and papers filed herein.

Dated: September 8, 2021

WONG FLEMING

By: /s/ Dafney Dubuisson Stokes

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